



Linda S. Adams
Secretary for
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Department of Toxic Substances Control

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Arnold Schwarzenegger
Governor

April 30, 2008

Marine Corps Air Station El Toro
Base Realignment and Closure
Attn: Ms. Debra Theroux
Deputy Base Closure Manager
7040 Trabuco Road
Irvine, California 92618

COMMENTS ON DRAFT SUMMARY REPORT FOR GROUP IV POTENTIAL RELEASE LOCATIONS (PRLs) ENVIRONMENTAL BASELINE SURVEY, FORMER MARINE CORPS AIR STATION (MCAS) EL TORO, IRVINE, CALIFORNIA

Dear Ms. Theroux:

The California Department of Toxic Substances Control have reviewed the subject document, dated March 31, 2008 and prepared by Earth Tech Inc.

The report describes the background of the Base, the descriptions of the PRLs, and the sampling and analysis methodology used in the assessments of 6 PRLs, designated PRL 46, PRL 133, PRL 312, PRL 439, PRL 457, and PRL 634. A Summary Report for each of these PRLs is attached to the main report. DTSC has the following comments.

PRL 46, associated with Building 46 in the northwestern part of the Base, is contaminated with polycyclic aromatic hydrocarbons (PAH) above residential PRGs. Specifically, benzo(a)pyrene had been detected at 72 ug/kg in one boring, and detectable concentrations of a variety of other PAH species are present as well. For comparison, the residential PRG of benzo(a)pyrene is 62 ug/kg.

Additional step-out sampling showed the extent of the PAH contamination is probably limited to shallow soils in the vicinity of the original boring HA-5.

The report evaluates the PAH contamination at the site compared to "Anthropogenic Reference Level" and refers to a report titled "Final Report Anthropogenic PAH Reference-Level Study, MCAS El Toro, by Bechtel National, Inc, dated July 1996.

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Comments:

- 1) A cursory review of the PAH Reference-Level study, we find that there were a large number of non-detect samples for PAH in the investigation, indicating that anthropogenic PAH is not prevalent at El Toro. The report concludes (Section 4-1) "The calculated reference levels do not support the hypothesis that surface soils at MCAS El Toro have anthropogenic PAHs at or above the residential soil PRGs." DTSC is of the opinion that the reference levels are inappropriate for the current assessment of PRL 46.
- 2) The Navy should calculate potency equivalent factors (PEFs) for PAH following Table 8 of the document "Technical Support Document for Describing Available Cancer Potency Factors" OEHHa 2002 available on the Web at:
http://www.oehha.org/air/hot_spots/pdf/TSDNov2002.pdf

If you have any questions, please contact me at (714) 484-5418.

Sincerely,



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